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10 BROCADE COMMUNICATIONS SYSTEMS, INC. AND
FOUNDRY NETWORKS, LLC

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 BROCADE COMMUNICATIONS
15 SYSTEMS, INC., a Delaware corporation, and
FOUNDRY NETWORKS, LLC, a Delaware
16 limited liability company,

17 Plaintiffs/Counterclaim Defendants,

18 v.

19 A10 NETWORKS, INC., a California
corporation; LEE CHEN, an individual;
20 RAJKUMAR JALAN; an individual; RON
SZETO, an individual; DAVID CHEUNG, an
21 individual; LIANG HAN, an individual; and
STEVEN HWANG, an individual,

22 Defendants/Counterclaimants.
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Case No. 10-cv-03428 LHK

**DECLARATION OF TERI H.P.
NGUYEN IN SUPPORT OF
PLAINTIFFS BROCADE
COMMUNICATIONS SYSTEMS, INC.
AND FOUNDRY NETWORKS, LLC'S
MOTION TO COMPEL FORENSIC
INSPECTION OF RON SZETO'S
COMPUTER HARD DRIVES**

Judge: Hon. Lucy H. Koh

1 I, Teri H.P. Nguyen, declare:

2 1. I am licensed to practice law in the State of California and an associate with the
3 law firm Orrick, Herrington & Sutcliffe LLP, counsel of record for Plaintiffs Brocade
4 Communications Systems, Inc. and Foundry Networks, LLC ("Plaintiffs") in this action. I have
5 personal knowledge of the facts stated herein, and I could and would testify competently to those
6 facts if called as a witness.

7 2. Attached as Exhibit A is a true and correct copy of an email to Ron Szeto from
8 Wen Chiu dated December 21, 2004, identified as Bates No. BrocadeA10_4432961.

9 3. Attached as Exhibit B is a true and correct copy of an email to Ron Szeto from Lee
10 Chen dated April 27, 2005, identified as Bates No. BrocadeA10_7631108.

11 4. Attached as Exhibit C is a true and correct copy of Brocade counsel's October 7,
12 2011 correspondence A10's counsel regarding Plaintiffs' request for the production of forensic
13 images of A10 engineer hard drives.

14 5. Attached as Exhibit D is a true and correct copy of excerpts of Plaintiffs' Second
15 Set of Requests for Production of Documents and Things to Defendant A10 Networks, Inc.,
16 served on April 15, 2011.

17 6. Attached as Exhibit E is a true and correct copy of excerpts of Plaintiffs' First Set
18 of Requests for Production of Documents and Things to Defendant Ron Szeto, served on May 18,
19 2011.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct.

22 Executed in Menlo Park, California on December 27, 2011.

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24 /s/ Teri H.P. Nguyen
25 TERI H.P. NGUYEN
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